UNITED STATES DISTRICT COURT WESTERN DISTRICT OF TEXAS AUSTIN DIVISION

UNITED STATES OF AMERICA,

Plaintiff

v.

NATIN PAUL a/k/a Nate Paul, No. A-23-CR-100-DAE

File Under Seal

Defendant

Unopposed Motion for Leave to File Discovery Notices under Seal

The United States seeks leave to file certain required discovery material under seal, and in support would respectfully show the Court the following.

Pursuant to the Court's March 20, 2024 Scheduling Order, the government will file today the notices required by Rule 404(b)(3) of the Federal Rules of Evidence; Rule 12(b)(4) of the Federal Rules of Criminal Procedure; and Rule 12.4(a)(2) of the Federal Rules of Criminal Procedure. (Sched. Ord. [doc. 73] at 2.) The government respectfully contends that those notices should be filed and kept under seal, and the defendant's counsel does not oppose sealing.

The government's notice under Rule 404(b) refers to acts of the defendant that the Indictment and Superseding Indictment do not allege. That notice also identifies a number of government witnesses by name who have not been publicly identified. The government's notice under Rule 12(b)(4) refers to sealed search warrants. And the government's notice under Rule 12.4(a)(2) identifies alleged victims whom the Indictment and Superseding Indictment identify only by pseudonyms.

In order to preserve the confidentiality of all of the foregoing information, the government respectfully requests that it be permitted to file under seal the notices described above, and that they be kept under seal until further order of the Court.

Respectfully submitted,

JAIME ESPARZA
UNITED STATES ATTORNEY

By: /s/ Alan M. Buie

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Certificate of Service

On May 1, 2024, I filed the foregoing motion by way of the Court's CM/ECF system, which automatically serves a copy on Defendant's counsel of record.

/s/ Alan M. Buie
Alan M. Buie
Assistant United States Attorney

Certificate of Conference

On April 29, 2024, I conferred by electronic mail with Defendant's counsel of record, and counsel does not oppose the relief sought by the foregoing motion.

/s/ Alan M. Buie
Alan M. Buie
Assistant United States Attorney